

# **EXHIBIT D**

## **Inaccessible Counters, Dining Surfaces, Toilet Rooms, Circulation Paths, and Parking and Shuttle Service**

### **1. Inaccessible Counters**

- a. Sales and service counters throughout Wrigley exceed the maximum height of 36" above the finish floor ("AFF"). 2010 Standards §§ 227.3, 904.4; 28 C.F.R. § 36.302(a).
- b. These sales and service counters include:
  - i. Ticket windows inside and outside the stadium.
  - ii. Sales and service counters on Gallagher Way.
  - iii. Concession stations throughout the stadium.
    1. Although some of these concession stations have auxiliary counters attached to them that do not exceed the maximum height of 36" AFF, these auxiliary counters are often maintained in a down position, are placed up against the wall and electrical outlets, and/or may not provide the requisite clear floor space.
  - iv. Examples specific to the bleachers:
    1. Bar sales counters and Three Fingers Bar in the Budweiser Patio.
    2. Bar sales counters in the Right Field Porch.
    3. Bar sales counter in the Fannie May Bleacher Sweet.
    4. Beer counter in the LG Porch.
    5. Budweiser Bleacher Bar on the ground floor. Although there are counter portions that are permanently lowered, these lowered portions are obstructed by tall beer taps.
  - v. Examples specific to the main concourse:
    1. Goose Island bar.
    2. Food counter across from Goose Island.
    3. Northside Taqueria counter.
- c. Self-serve food and condiment counters throughout Wrigley exceed the maximum height of 34" AFF, including in the Budweiser Patio and 1914 Club. 2010 Standards §§ 227.4, 904.5.

### **2. Inaccessible Dining Surfaces**

- a. Forward-approach bars do not have sufficient floor space or clearance beneath the counter, including in the W Club and the 1914 Club. 2010 Standards §§ 226.1, 902.2, 305.4, 306.2, 306.3.
- b. There are no accessible tables that provide compliant knee and toe clearance in any food location where tables are provided. 2010 Standards §§ 226.1, 902.2, 305.4, 306.2, 306.3.
- c. In the W Club, there is a 42" AFF dining counter against the wall that faces windows providing a view into the batting cage. 2010 Standards §§ 221.2.3, 226.1, 902.2, 305.4, 306.2, 306.3; 28 C.F.R. § 36.302(a).
- d. In the Catalina Club, the dining counter at the windows is 34.5" AFF. 2010 Standards §§ 226.1, 902.3.

### 3. Inaccessible Toilet Rooms

- a. Items throughout the stadium:
  - i. Paper towel dispensers are mounted out of reach range. 2010 Standards §§ 205.1, 309.3, 308.2, 308.3.
  - ii. Toilet paper dispensers are not mounted properly. 2010 Standards §§ 213.2, 604.7.
  - iii. Water closet grab bars are obstructed by objects mounted above or below the grab bars. 2010 Standards §§ 213.2, 604.5, 609.3.
  - iv. Baby changing table pull-down handles are out of reach range. 2010 Standards §§ 205.1, 309.3, 308.2, 308.3.
  - v. The work surfaces of baby changing tables are higher than 34" AFF. 2010 Standards §§ 226.1, 902.3.
  - vi. The Poo Doo bag dispensers in toilet rooms are mounted higher than 48" AFF. 2010 Standards §§ 205.1, 309.3, 308.2, 308.3.
  - vii. Pull handles are not provided on both sides of wheelchair-accessible compartment doors. 2010 Standards §§ 213.2, 604.8.1.2.
  - viii. Toilet room mirrors are higher than 40" AFF to the bottom of the reflecting surface. 2010 Standards § 603.3.
  - ix. Trash cans obstruct door maneuvering clearance at toilet room doors. 2010 Standards §§ 206.5.2, 404.2.4.1.
  - x. Lavatories are mounted higher than 34" AFF. 2010 Standards §§ 213.2, 606.3.
  - xi. Trough urinal rims are higher than 17" AFF. 2010 Standards §§ 213.2, 605.2.
- b. Items specific to center field family toilet room in bleachers (near elevator on main bleacher concourse):
  - i. The side grab bar is 36" long. 2010 Standards §§ 213.2, 604.5.1.
  - ii. Trash can obstructs water closet clear floor space. 2010 Standards §§ 213.2, 604.3.1.
  - iii. The mirror is 43.5" AFF to the bottom of the reflecting surface. 2010 Standards §§ 213.2, 603.3.
  - iv. The lavatory pipe insulation has fallen off. 28 C.F.R. § 36.211; 2010 Standards §§ 213.2, 606.5.
  - v. The toilet room turning space slopes up to 6.8%. 2010 Standards §§ 603.2.1, 304.2.
  - vi. The threshold slopes 25% on the exterior side of the door. 2010 Standards §§ 206.5.2, 404.2.4.4.
  - vii. The visual alarm is 77" AFF to the centerline of the signal. 2010 Standards §§ 215.2, 702.1.
- c. Items specific to center field multi-user women's toilet room on ground floor of bleachers:
  - i. The water closet seat is 19.5" AFF inside the wheelchair-accessible compartment. 2010 Standards §§ 213.2, 604.4.
  - ii. The water closet centerline is 19" from the side wall in the wheelchair-accessible compartment. 2010 Standards §§ 213.2, 604.2.

- iii. There is a large opening at the entrance door where the concrete is damaged. 2010 Standards §§ 206.5.2, 404.2.4.4.

#### **4. Inaccessible Circulation Paths**

- a. Wrigley contains many protruding objects that are greater than 27" AFF and that protrude horizontally more than 4" into circulation paths. 2010 Standards §§ 204.1, 307.2.
- b. These protruding objects include:
  - i. Defibrillators;
  - ii. Televisions;
  - iii. Drinking fountains;
  - iv. Rails protecting stairs and column supports;
  - v. Queue line stanchions and tapes; and
  - vi. Boxes on the outside of the stadium.
- c. Examples specific to the bleachers:
  - i. The protruding object protection under the stair to seating §§ 514 and 515; and
  - ii. Handrail extensions in the Right Field Porch.
- d. With respect to accessible routes, Wrigley also contains non-compliant walkway openings and slopes.

#### **5. Inaccessible Parking and Shuttle Service**

- a. The ground surface of the accessible parking spaces in the Irving Park lot contains gaps, vertical changes, loose surface materials, and excessive cross slopes. 2010 Standards §§ 208.2, 302.1, 502.4.
- b. Golf cart shuttles from Camry Lot are not accessible to all wheelchair users. 49 C.F.R. §§ 37.5, 37.101.
- c. Busses providing shuttle service to/from Rockwell lot are not accessible. 49 C.F.R. §§ 37.5, 37.101
- d. Barriers to shuttle service on Waveland (*e.g.*, jersey barriers, curb). 28 C.F.R. §§ 36.302(a), 36.105(e)(3).